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**RECEIVED**

March 11, 1999

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**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

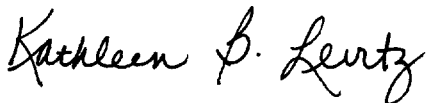
Re: Written Ex Parte in CC Docket No. 98-147

Dear Ms. Salas:

This is to inform you that on March 11, 1999, BellSouth Corporation has made the attached written ex parte presentation to Kyle Dixon, Legal Advisor to Commissioner Powell and Tom Power, Legal Advisor to Chairman Kennard.

Pursuant to the Commission's rules, we are filing two copies of this notice and that written ex parte presentation and ask you to include both in the record in CC Docket No. 98-147.

Sincerely,



Kathleen B. Levitz  
Vice President-federal Regulatory

Attachment

cc: Kyle Dixon (w/o attachment)  
Tom Power (w/o attachment)

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# CC Docket 98-147 Ex Parte

BellSouth Telecommunications, Inc.

March 11, 1999

# **Central Office Collocation**

## **◆ What BellSouth is doing:**

- ✓ Common area collocation, including cageless collocation
- ✓ Real time information on space availability on per request basis
- ✓ Web-based report on space exhaust, updated within 1 week of filed petition
- ✓ Collocation of DSLAM equipment in virtual and physical collocation
- ✓ Collocation of switching equipment in physical collocation

## **◆ State Commissions have diligently addressed collocation standards**

- ✓ Florida has established interval guidelines, is actively examining space exhaust/exemption process
- ✓ Georgia is examining current issues and comprehensive terms and conditions in upcoming workshop
- ✓ Louisiana has workshops in progress addressing intervals and performance measurements
- ✓ Kentucky and North Carolina have ordered collocation options

## **◆ The Commission should not preempt the work of state commissions**

# Central Office Collocation

## Equipment

- ◆ **The Commission should exercise caution in removal of equipment restrictions**
  - ✓ There should be no unilateral requirement to allow switching equipment, particularly in virtual collocation, due to maintenance/servicing concerns, space allocation and grounding issues.
  - ✓ Limitation to “equipment necessary for interconnection or access to UNEs”, which necessarily allows xDSL electronics, such as DSLAMs, are reasonable.
  - ✓ The Commission should decline to require collocation of equipment used to provide enhanced services.

## Space Allocation

- ◆ **Cumbersome reporting requirements will not accomplish the Commission’s goal of efficient use of space or providing information useful to CLECs.**
  - ✓ Timely reporting of space exhaust via the web or upon request will meet this goal
  - ✓ In order for a report of space availability to be meaningful to CLECs, it must address the availability of space and infrastructure for a particular CLEC’s configuration.
- ◆ **BellSouth supports upholding the Commission’s existing rules on space warehousing.**

# Central Office Collocation

## Intervals

### ◆ **The Commission should not establish presumptive intervals**

- ✓ Such intervals would be arbitrary and could not take into account regional/state-specific anomalies such as rigorous permitting requirements.
- ✓ National standards step over state-established guidelines and procedures.
- ✓ State commissions are in a better position to determine on a case by case basis whether BellSouth is delaying collocation.
- ✓ Establishing interval national guidelines instead of focusing on performance management and measurement is an illusory approach to meeting the Commission's goals.

# Remote Terminal Collocation

- ◆ **Because this issue is tied to sub-loop unbundling, the Commission should defer resolution until the “necessary and impair” issues are resolved**
- ◆ **Collocation in remote terminals should be required only on a case-by-case basis where technically feasible because of**
  - ✓ **limited space in remote terminals**
  - ✓ **severe power and heat dissipation in cabinets**
  - ✓ **security concern**
- ◆ **BellSouth has successfully negotiated agreements using a cross-box to cross-box interconnection arrangement**

## Resale Requirements

- ◆ **Section 251(c)(4) resale obligations only apply if the service is offered at retail**
- ◆ **BellSouth's ADSL service is clearly not a retail service**